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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE COMMISSION  
OFFICE OF THE CLERK

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

UNITED STATES POSTAL SERVICE RESPONSE TO  
PRESIDING OFFICER'S REQUEST FOR STATUS REPORT  
(September 13, 2002)

The United States Postal Service hereby responds to Presiding Officer's Ruling No. C2001-3/31 (September 12, 2002), which seeks a status report on discovery related to Rulings No. C2001-3/23 and C2001-3/28.

In response to Ruling No. C2001-3/23, the Postal Service has been diligently organizing the matrix of volume data that are to be provided under the applicable protective conditions. It is anticipated that the internal review of the resulting electronic file will be completed next week, that it can be burned onto a compact disc, and filed under seal on or before September 20, 2002. At that point, parties should be able to access the document under the protection conditions made applicable by that ruling.

Regarding its options in response to Ruling No. C2001-3/28, the Postal Service was given until August 23, 2002, to conclude its internal deliberations. The Postal Service regarded it as implicitly clear that, if it did not seek reconsideration or certification of the ruling by that date, it could be presumed to have decided to take such action as would be necessary to bring itself into compliance with the ruling. In hindsight, the Postal Service appreciates that there apparently may have been some value in making that understanding absolutely explicit.

In any event, the Postal Service has been working on two fronts to respond to this ruling. At the earliest available opportunity, the senior analyst most experienced with the Origin-Destination Information System (ODIS) database was called in to create the programs necessary to extract the requested matrix of time-in-transit data. It was estimated earlier this month that the project would be completed toward the end of September. When the data are generated, they will be circulated for expeditious internal review and then disclosed.

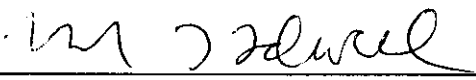
At the same time, for the purpose of producing the External First-Class Measurement System data set responsive to the ruling, the Postal Service took steps last month to procure the necessary additional services from PriceWaterhouseCoopers, which manages and operates the system. During a status meeting at the beginning of this month, it was estimated that output from this effort could be produced as early as the third week of September. When these data are transmitted to the Postal Service, they also will be circulated for expeditious internal review and then disclosed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

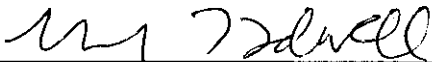
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel  
Ratemaking

  
\_\_\_\_\_  
Michael T. Tidwell  
Attorney

### CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

  
\_\_\_\_\_  
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998/ FAX: -5402  
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